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17 *Attorneys for Debtors*  
18 *and Debtors in Possession*

19 **IN THE UNITED STATES BANKRUPTCY COURT**  
20 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN FRANCISCO DIVISION**

22 **In re:**

Case No. 19-30088 (DM)

23 **PG&E CORPORATION,**

Chapter 11

24 **- and -**

(Lead Case)

25 **PACIFIC GAS AND ELECTRIC**  
26 **COMPANY,**

(Jointly Administered)

27 **Debtors.**

28 ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas & Electric Company  
☒ Affects both Debtors

\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).

**SUPPLEMENTAL DECLARATION OF  
RANDALL E. MEHRBERG IN SUPPORT  
OF APPLICATION PURSUANT TO 11  
U.S.C. § 327(e) AND FED. R. BANKR. P.  
2014(a) AND 2016 FOR ORDER  
AUTHORIZING THE DEBTORS TO  
RETAIN JENNER & BLOCK LLP AS  
SPECIAL CORPORATE DEFENSE  
COUNSEL NUNC PRO TUNC TO THE  
PETITION DATE**

1 I, Randall E. Mehrberg, hereby declare:

2 I am a partner of Jenner & Block LLP ("**Jenner & Block**" or the "**Firm**"), a law firm with  
3 offices in Chicago, Illinois; New York, New York; Washington, D.C.; Los Angeles, California;  
4 and London, United Kingdom. I am currently resident in Jenner & Block's Chicago office, located  
5 at 353 North Clark Street, Chicago, IL 60654. I am a member in good standing of the bar of the  
6 State of Illinois, and there are no disciplinary proceedings pending against me.

7 I submit this Supplemental Declaration to supplement my original declaration (the  
8 "**Original Declaration**") filed in connection with the Application<sup>1</sup> of the above-captioned debtors  
9 and debtors in possession (collectively, the "**Debtors**"), for an order, pursuant to section 327(e) of  
10 title 11 of the United States Code (the "**Bankruptcy Code**") and Rules 2014(a) and 2016 of the  
11 Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), approving the retention of  
12 Jenner & Block as the Debtors' special corporate defense counsel effective as of January 29, 2019  
13 (the "**Petition Date**"). Unless otherwise stated in this Supplemental Declaration, I have personal  
14 knowledge of the facts set forth herein.

15 To the extent that any information disclosed herein requires subsequent amendment or  
16 modification upon Jenner & Block's completion of further analysis or as additional information  
17 regarding creditors and other parties in interest becomes available, one or more supplemental  
18 declarations will be submitted to the Court reflecting the same.

#### 19 **JENNER & BLOCK'S DISINTERESTEDNESS AND CONNECTIONS**

20 My Original Declaration set forth information about Jenner & Block's disinterestedness  
21 and connections with parties in interest in these Chapter 11 Cases.

22 Since the filing of my Original Declaration, Jenner & Block identified the following parties  
23 in interest or affiliates of parties in interest that Jenner & Block or Jenner & Block attorneys  
24 currently represent or have represented in the last two years, in matters unrelated to the Debtors'  
25 cases:

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26  
27 <sup>1</sup> Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to  
28 such terms in the Application.



<b>Name of Entity Searched</b>	<b>Name of Entity and/or Affiliate of Entity That Is a Jenner &amp; Block Client</b>	<b>Client Status</b>	<b>Relationship to Debtors</b>
Brace Integrated Services Inc.; Platinum Scaffolding; Statewide Traffic, Safety & Signs	Sterling Fund Management, LLC (affiliate of the searched entities)	Current	Vendors
Port of Oakland	Port of Oakland	Current	Issuer of Letter of Credit
Morgan Stanley Capital Group Inc.; Morgan Stanley Bank, N.A.; Morgan Stanley Senior Funding	Beverly Wilshire Owner LP (an affiliate of Morgan Stanley)	Current	Secured Lender
Crown Castle	Crown Castle	Current	Lease Counterparty

I continue to believe that: none of Jenner & Block or any partner in, counsel to, or associate of Jenner & Block represents any entity in or in connection with these Chapter 11 Cases other than the Debtors; Jenner & Block and I do not hold or represent an interest adverse to the Debtors; and neither Jenner & Block nor any of its attorneys, including me, (i) is a creditor, equity security holder, or insider of the Debtors, (ii) has been, within two years before the date of the filing of the petition, a director, officer, or employee of the Debtors, or (iii) has any interest materially adverse to the interests of the estate or any class of creditors by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

Jenner & Block's practices encompass the representation of many diverse clients, some of which may be or may become creditors or parties in interest. To the extent that, during or at the conclusion of Jenner & Block's employment in these Chapter 11 Cases, it discovers any facts bearing on matters described in this Supplemental Declaration, Jenner & Block will supplement the information contained in this Supplemental Declaration.

Based on the foregoing, I believe that Jenner & Block is a "disinterested person," as defined in section 101(14) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors, as required by section 327(e) of the Bankruptcy Code, and that Jenner & Block's partners, associates, and special attorneys do not hold or represent any interest adverse to the

1 Debtors or their estates. Accordingly, I submit that Jenner & Block is not disqualified for  
2 employment by the Debtors under section 327(e) of the Bankruptcy Code.

3 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
4 and correct to the best of my knowledge, information, and belief.

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6 Dated: June 14, 2019  
7 Chicago, Illinois

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Randall E. Mehrberg